Case 1:24-cr-00085-ENV Document 1 Filed 02/23/24 Page 1 of 1 PageID #: 1 **FILED** IN CLERK'S OFFICE US DISTRICT COURT E.D.N.Y. * FEBRUARY 23, 2024 * HDM:JPL/NMA **BROOKLYN OFFICE** F. #2019R01465 UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK ----X UNITED STATES OF AMERICA FILED UNDER SEAL - against -NOTICE OF MOTION Criminal Docket No. 24-CR- (85) GUNVOR, S.A., Judge Kiyo A. Matsumoto Defendant. Magistrate Judge Taryn A. Merkl -----X PLEASE TAKE NOTICE that the undersigned will move this Court, before a judge to be assigned, for leave to file an information upon the defendant GUNVOR, S.A.'s waiver of indictment pursuant to Rule 7(b) of the Federal Rules of Criminal Procedure. Dated: Brooklyn, New York February 23, 2024 **BREON PEACE United States Attorney** Eastern District of New York By: $/_{\rm S}/$ Jonathan P. Lax Nick M. Axelrod

Assistant United States Attorneys (718) 254-7000

c.c.: Clerk of the Court Defense Counsel (by e-mail)